



BROWNING-FERRIS INDUSTRIES

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PE83-05/25/83

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May 25, 1983

Mr. John Jimenez
Solid & Hazardous Waste Division - 9th Floor
U.S. Environmental Protection Agency - Region II
#26 Federal Plaza
New York, New York 10278

Subject: Operational Plans
Partial Closure Plan SK&F Ponds - Ponce, Puerto Rico

Dear Jimenez:

Last week our Mr. Jim LaDue (his letter to you of May 17th) provided an initial closure plan for the work that will be done in the Ponce Municipal facility for closure of the existing surface impoundments for SK&F wastes.

I have attached for your review and file a copy of our more fully detailed, four page, operating plan which was prepared by the project team that will be implementing the closure.

We recall your attention to the fact that following the physical closure of these existing impoundments, with the related stabilization and removal of the wastes, the area of these units will be under the continuing management of CECOS and an integral part of the closure/post closure plan for the entire Ponce facility.

It is my understanding that Jim LaDue will be through NYC this week to review this plan with you in person. In his absence please feel free to contact me at (713) 870-7857 for any further information on this issue.

The efforts and cooperation of your agency in reaching a satisfactory resolution on this issue is appreciated.

Very truly yours,

Jack Lurcott
Division Vice President
Chemical Waste Services

JL/jmo

cc: J. LaDue - Buffalo, New York
J. Ortiz - Rio Piedras, PR
C. Beardon - Houston
G. Davis - Houston

7.0 PLANS FOR CLOSURE

The following sections include the approaches to be used to close the facility. Section 7.1 provides the approach for closing the existing surface impoundments. Sections 7.2, 7.3, and 7.4 describe the approaches to closure of the storage areas, treatment facilities, and secure landfill, respectively.

Sections 7.1, 7.2, 7.3, and 7.4 are not intended to be complete Closure Plans. They should only provide general approaches to the required closure activities. These plans will be completed in final form when appropriate assessment, analyses, and designs are complete.

7.1 Closure Plans for Existing Surface Impoundments

In order to prepare a complete closure plan for the existing surface impoundments, testing of the liner, other structures and surrounding subsoils must be made to determine if they are contaminated to such an extent which requires their removal or the design of a post-closure care plan to include monitoring. The liners, other structures and subsoils will be analyzed for the characteristics of hazardous waste. Analytical parameters will include: ignitability, corrosivity, reactivity, EP toxicity and priority pollutants. The methods used for these analyses are sited in 40CFR, Part 261, Subpart C.

Following the analyses previously mentioned, the surface impoundments will be closed. The closure will follow one of two plans listed below, depending upon the results of the analyses.

:

CLOSURE PLAN #1

- a) All waste residues will be removed or decontaminated.
- b) Contaminated containment system components (liners, etc.), contaminated subsoils, and structures and equipment contaminated with waste or leachate will be removed or decontaminated.
- c) All of the previously mentioned items in (a) and (b) will be treated as hazardous waste if not decontaminated.

CLOSURE PLAN #2

- a) All free liquids will be removed, by either physical removal or solidification.
- b) The remaining wastes will be stabilized to a bearing capacity sufficient to support the final cover.
- c) The surface impoundment will be covered, with a cover designed and constructed to:
 - 1) provide long-term minimization of the migration of liquids through the closed impoundment,
 - 2) function with minimum maintenance, .
 - 3) promote drainage and minimize erosion or abrasion of the final cover,
 - 4) accommodate settling and subsidence so that the covers integrity is maintained, and
 - 5) have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present.